

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: SUBPOENA TO NON-PARTY  
AMERICAN HOSPITAL ASSOCIATION,**

**UNITED STATES OF AMERICA, *et al.*  
*ex rel.* JESSE POLANSKY M.D., M.P.H.,**

**Plaintiffs,**

**v.**

**EXECUTIVE HEALTH RESOURCES, INC.,  
*et al.*,**

**Defendants.**

**Civil Action No.:**

**Related to 2:12-CV-04239-MMB in  
the United States District Court for  
the Eastern District of Pennsylvania**

**RELATOR'S MOTION TO ENFORCE RULE 45 SUBPOENA**

Notice is hereby given of the filing of this motion pursuant to Rule 45 of the Federal Rules of Civil Procedure by Relator Dr. Jesse Polansky. This motion seeks to compel the American Hospital Association ("AHA") to comply with the subpoena that Relator has issued to it and to produce and permit for inspection and copying the materials specified in that subpoena. Relator has attempted in good faith to negotiate with AHA to reach an agreed-upon solution to the document production requests, but AHA has unilaterally terminated negotiations and refused to produce any documents. As such, Relator now moves to compel AHA to comply with the subpoena.

Dated: July 22, 2019

Respectfully submitted,

By: /s/ Schuyler Ferguson

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served by electronic mail on July 22, 2019 to the following counsel of record:

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